

EXHIBIT 6

Proceedings Taken of Christian Picciolini on 02/08/2019

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

9 The deposition of CHRISTIAN PICCIOLINI, called
10 for examination, taken pursuant to notice and
11 pursuant to the Federal Rules of Civil
12 Procedure for the United States District
13 Courts pertaining to the taking of
14 depositions, taken before Angela C. Loisi,
15 Certified Shorthand Reporter, Registered
16 Professional Reporter, Federal Certified
17 Realtime Reporter, at 505 North LaSalle
18 Street, Suite 350, Chicago, Illinois,
19 commencing at 1:07 p.m. on February 8, 2019.

21 (Proceedings ended at 6:29 p.m.)

24 || Reporter: Angela C. Loisi, CSR, RPR, FCRR

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1 APPEARANCES:

2 SAPER LAW OFFICES, LLC

3 BY: MS. DALIAH SAPER

4 MR. CHRIS MONACO

5 505 North LaSalle Street, Suite 350

6 Chicago, Illinois 60654

7 (312) 527-4100

8 Ds@saperlaw.com

9 Cm@saperlaw.com

10 Representing the Plaintiff;

11

12 SAUL EWING ARNSTEIN & LEHR

13 BY: MR. EUGENE GEEKIE, JR.

14 161 North Clark Street, Suite 4200

15 Chicago, Illinois 60601

16 (312) 876-7838

17 Eugene.geekie@saul.com

18 Representing Free Radicals,

19 Christian Picciolini;

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1 APPEARANCES CONTINUED:

2 PRETZEL & STOUFFER, CHARTERED

3 BY: MR. JAMES J. SIPCHEN

4 1 South Wacker Drive, Suite 2500

5 Chicago, Illinois 60606-4673

6 (312) 346-1973

7 Jsipchen@pretzel-stouffer.com

8 Representing Counter-defendant,

9 Life After Hate, Sammy Rangel,

10 Angela King, Frank Meeink,

11 Tony McAleer.

12

13 ALSO PRESENT:

14 Mr. Tony McAleer.

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I N D E X

WITNESS: CHRISTIAN PICCIOLINI PAGE

Examination by Ms. Saper 5

E X H I B I T S

CHRISTIAN PICCIOLINI PAGE

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1 (Witness sworn.)

2 WHEREUPON:

3 CHRISTIAN PICCIOLINI,

4 called as a witness herein, having been first
5 duly sworn, was examined and testified as
6 follows:

7 EXAMINATION

8 BY MS. SAPER:

9 Q. Okay. So, Christian, you attended
10 Tony and Sammy's deposition. So you kind of
11 know how this works I would say.

12 A. I think so.

13 Q. Yeah. You understand that you're
14 giving your testimony today under oath?

15 A. I do.

16 Q. And that being under oath means you
17 have to tell the truth.

18 A. I do.

19 Q. When you give a response you need to
20 make sure it's a vocal, verbal response, not
21 nodding your head or shaking your head.

22 A. Correct.

23 Q. There isn't anything that will prevent
24 you from answering the questions today?

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1 formal business?

2 MR. GEEKIE: Objection; form.

3 THE WITNESS: I don't...

4 BY MS. SAPER:

5 Q. Did you create an LLC for the website?

6 A. I'm not aware that a website can have
7 an LLC created. The business itself, Life
8 After Hate, was incorporated in 2010 by me and
9 Arno.

10 Q. Okay. That's the question.

11 A. Yeah.

12 Q. So you and Arno decided to incorporate
13 a business. What did you call it?

14 A. Life After Hate, Inc.

15 Q. Who created the -- who filled out the
16 incorporation documents?

17 A. Perhaps if you show them to me I could
18 tell you, but it would have been me and Arno
19 both having input on that.

20 Q. Okay. If I asked Arno whether you
21 helped create the entity, what would he say?

22 MR. GEEKIE: Objection; form, improper
23 question. He has no way of knowing what Arno
24 would say.

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1 Q. Did the Wisconsin corporation ever
2 sell any books?

3 A. No, I don't believe so. I think Arno
4 sold those books on his own. And he may have
5 you know used part of that money to -- as I
6 did to fund the organization at the time.

7 Q. Did the Wisconsin corporation ever
8 make any money from your speaking engagements?

9 A. No. I don't know why they would have.

10 Q. Did the Wisconsin corporation ever
11 make any money from Arno's speaking
12 engagements?

13 A. I don't know.

14 Q. Did the Wisconsin corporation ever
15 make any money from advertisements on the
16 website?

17 A. I don't believe so.

18 Q. Okay. So did you and Arno ever attend
19 any conferences related to extremism prior to
20 2012?

21 A. Yeah. We were at -- when I was 14 and
22 he was 15 -- I mean, you asked a vague
23 question so I'm going to give you the answer
24 you asked for.

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1 A. It would have been from day one, which
2 is 2012, I believe.

3 Q. What are the duties of an executive
4 director?

5 A. I'm sorry. Can you go back to -- did
6 you ask executive director or executive chair?

7 Q. Director.

8 A. Director, oh. I wouldn't have
9 been execu -- let me correct my last one
10 then. I wouldn't have been executive director
11 in 2012. Arno was the executive director, I
12 was the executive board chair.

13 Q. What does an executive board chair do?

14 A. I think the executive board chairs
15 role -- my role was to provide oversight on
16 the organization to fundraise, to recruit
17 other board members.

18 Q. Did you recruit other board members?

19 A. I believe so.

20 Q. Do you remember who you recruited?

21 A. When? We went through a lot.

22 Q. In 2012 when you were serving as
23 executive board chair?

24 A. I believe Mr. McAleer, potentially

1 BY MS. SAPER:

2 Q. Did Gravity Tank create the tag line
3 or did Life After Hate create the tag line, no
4 judgment, just help?

5 A. No, I did.

6 Q. You created that tag line?

7 A. Yes.

8 Q. Independently?

9 A. Yes, as well as the logos for both.

10 Q. Okay. When did you create the Oak
11 Creek video? Actually, I should back up
12 before I ask that question.

13 So after you created the logos and the
14 tag line, no judgment, just help, did you
15 think about creating videos?

16 A. The videos that were created around
17 that same time had actually been developed in
18 the treatment years before in 2011. And I do
19 believe around that time I created three
20 videos, yes. One was called The Formers, one
21 was called Oak Creek, and I think the other
22 one was called There is Life After Hate.

23 Q. When you say they were treatments, did
24 you ever copyright those treatments?

1 MR. GEEKIE: Speak up.

2 THE WITNESS: I will.

3 BY MS. SAPER:

4 Q. Did anyone respond to your treatments?

5 When you sent the treatments, who did
6 you send them to?

7 A. I don't recall who I would have sent
8 them to exactly. I know one person was Jane
9 Rosenthal. And I believe I got some sort of a
10 reply but I don't remember what that reply
11 was.

12 Q. Okay.

13 A. Maybe just an acknowledgement or
14 something.

15 Q. So did anyone offer to work with you
16 to make the treatments a reality in 2010, is
17 that when you said you sent them, 2011?

18 A. Yeah. I mean, I think it was that
19 year, but I don't know. They never went
20 forward, so nobody ever...

21 Q. Okay. So when did the idea to create
22 the videos come back to life?

23 A. Well, they never really went away for
24 me. I always had wanted to do the videos. I

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1 lived in L.A., and both Tim and Matthew lived
2 there so I flew myself out to L.A., paid for
3 that. And also worked with him as he was
4 editing the video and as he was making the
5 music, scoring the music for the video. And I
6 also voiced that over as well as --

7 Q. So --

8 A. -- you know, used the logo that I had
9 licensed to -- you know, for no charge to Life
10 After Hate in the video that I created.

11 Q. Well, let's break that down.

12 First, Mike Racanelli is a
13 videographer?

14 A. Yes.

15 Q. And who scored the music?

16 A. He did.

17 Q. Okay. He's a videographer and a
18 composer?

19 A. He's a man of all trades.

20 Q. Okay. So do you have an agreement
21 with him?

22 A. He's my best friend.

23 Q. Okay. So you didn't have any written
24 agreement with him?

1 the depositions of Rangel or McAleer. So we
2 object to using this for the same reasons
3 stated before.

4 BY MS. SAPER:

5 Q. Okay. As I was saying, I typed in to
6 WaybackMachine.com to determine when or if the
7 ExitUSA.org was redirected. For my later
8 search I saw that ExitUSA.org was redirected
9 on March 22, 2018, to FreeRadicals.org.

10 Did those dates sound about right?

11 MR. GEEKIE: Objection; form. The
12 document speaks for itself, to the extent it
13 can be used as evidence. "About right" is my
14 objection to form, and the witness has already
15 asked and answered your question.

16 MS. SAPER: I don't think he answered
17 the question.

18 MR. GEEKIE: He did.

19 BY MS. SAPER:

20 Q. I will ask to be sure.

21 Do you know if Free Radicals -- if you
22 pointed the ExitUSA.org domain name to
23 FreeRadicals.com?

24 A. I think the document speaks for

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1 itself.

2 Q. But I'm not asking you about the
3 document, I'm asking if you remember doing
4 that.

5 MR. GEEKIE: Objection; asked and
6 answered.

7 BY MS. SAPER:

8 Q. Just so we're clear you said you
9 didn't remember if you did it. You don't
10 remember whether or not you forwarded the
11 domain name to Free Radicals --

12 A. I --

13 MR. GEEKIE: Same objection.

14 THE WITNESS: I have no recollection
15 of that.

16 BY MS. SAPER:

17 Q. Did you contact Facebook regarding the
18 Life After Hate Facebook page in November
19 of 2017?

20 A. In what regard?

21 Q. Did you disable the page?

22 A. If I recall correctly it was tied to
23 my personal account, because that's how
24 Facebook pages work. And I think I went

1 Q. Is she still your personal assistant?

2 A. She is.

3 Q. Does she have a title at Free Radicals
4 Project?

5 A. She has just a n-- kind of a -- what's
6 the word I'm looking for? It's an honorary
7 title, but there's no business operating so
8 there really isn't anything for her to do
9 there. She's 100 percent dedicated to booking
10 my travel, updating my calendar, scheduling
11 meetings.

12 Q. Do you have a FreeRadicals.org page?

13 A. Yes.

14 Q. Do you know what the page says?

15 A. Not every word, no.

16 Q. On your website you list that [as
17 read] :

18 "The Free Radicals Project
19 is a global disengagement
20 platform that aids
21 individuals and their
22 families or communities in
23 existing, hateful and
24 violent-based

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1 radicalization through
2 nonaggressive
3 community-led methods of
4 individual
5 resilience-building,
6 reconnection,
7 cross-cultural immersion,
8 and making amends."

9 Does that sound right?

10 MR. GEEKIE: Objection; form.

11 The document or page speaks for
12 itself. Asking if it sounds right is simply a
13 test of whether or not you properly read it.

14 BY MS. SAPER:

15 Q. Who are your board members?

16 Who are the Free Radicals Project,
17 Inc. board members?

18 A. I've already answered that question.

19 Q. No, you answered who helped you with
20 this document or who may have been listed, and
21 you said Molly Ola Pinney and Robert Strauss.
22 I'm asking who your board members are.

23 A. I would like to correct that because
24 LegalZoom is what I answered when you asked

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1 A. So the submitting organization is Gold
2 Mill Group. The producing organization is
3 Gold Mill Group. The title of the video is
4 There is Life After Hate.

5 Q. So why is there this other Life After
6 Hate/ExitUSA in the title line?

7 A. Because I thought that using Life
8 After Hate was good cache that people would
9 recognize, and that they wouldn't recognize it
10 if there -- if it was just There is Life After
11 Hate. And certainly, in the description it
12 talks about that as well.

13 But Life After Hate, the organization,
14 and ExitUSA, the organization, had zero to do
15 with making this video or developing it or
16 creating it or producing it or even posting
17 it.

18 Q. Okay. Did you contribute your own
19 money into producing this There is Life After
20 Hate PSA?

21 A. Yes, as well as the two other videos.

22 Q. What kind of money did you give you?

23 A. I don't recall exactly how much, but
24 there were things that I paid for, like the

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1 that they were getting ready to hire me but
2 that having an interest in a nonprofit,
3 especially in the space where they worked,
4 would have been a problem.

5 Q. Got it. So what does that mean,
6 having an interest in the nonprofit?

7 A. That I was associated with a
8 nonprofit.

9 Q. Okay. So --

10 A. That I was an owner of the nonprofit.

11 Q. Okay. So did you stop being an owner
12 of the nonprofit in 2015?

13 MR. GEEKIE: Objection; calls for a
14 legal conclusion.

15 BY MS. SAPER:

16 Q. You can answer.

17 A. Can you ask that again?

18 Q. So what happened in 2015, did they
19 remove you?

20 What was your title after -- because
21 of the FBI job?

22 A. Who?

23 Q. The Life After Hate organization.

24 A. I mean, I think it was -- I think I

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1 went from executive board chair to board
2 member at the time. I ultimately didn't get
3 the FBI job. I pulled out when they made me
4 make that choice so I decided to stay with
5 Life After Hate.

6 Q. What is the Institute for Strategic
7 Dialogue?

8 A. They're an organization out of London
9 that engages in research and programming for,
10 you know, all types of violent extremism and
11 other things.

12 Q. How are they related to Life After
13 Hate, if at all?

14 A. I would have considered them a partner
15 during that time.

16 Q. How were they a partner?

17 A. You know, we were partners in the
18 sense that we engaged a lot as far as, you
19 know, projects that they wanted to do where
20 they wanted my advice and other people's
21 advice at Life After Hate.

22 There were some situations where
23 during the video campaign when we ran the
24 videos that they actually paid for the in-kind